

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION**

Regina Boston,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 3:12-cv-680-GCM
	)	
Leading Edge Recovery Solutions, LLC,	)	Honorable Judge Graham C. Mullen
	)	
Defendant.	)	
	)	
	)	
	)	

**DEFENDANT’S MOTION FOR SUMMARY JUDGMENT**

Defendant Leading Edge Recovery Solutions, LLC (“LERS”), hereby moves for summary judgment on Plaintiff’s Complaint pursuant to Federal Rule of Civil Procedure 56. Plaintiff’s one count Complaint alleges that LERS obtained her credit report from TransUnion without a permissible purpose in violation of the Fair Credit Reporting Act, 15 U.S.C. 1681, *et seq.* Contrary to Plaintiff’s allegations, the undisputed facts show that LERS had a permissible purpose to request her credit information from TransUnion – namely, LERS requested the credit information in connection with an attempt to collect the debt. This a permissible purpose under any reading of the law. For the reasons more fully stated in LERS’ accompanying Memorandum, summary judgment should be granted in LERS’ favor and Plaintiff’s Complaint should be dismissed with prejudice.

LEADING EDGE RECOVERY  
SOLUTIONS, LLC,

By: /s/ Timothy J. Tommaso  
Timothy J. Tommaso

Timothy J. Tommaso (IL State Bar No. 6293960)  
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Date: November 7, 2012

**CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing DEFENDANT'S MOTION FOR SUMMARY JUDGMENT was served upon the following:

Regina Boston  
1220 Ballina Way  
Charlotte, North Carolina 28214

by depositing a copy of same in the United States Mail, postage prepaid, on November 7, 2012.

/s/Timothy J. Tommaso  
Timothy J. Tommaso